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12 Corinthian Colleges Inc., David Moore,
13 and Jack D. Massimino

14 UNITED STATES DISTRICT COURT
15
16 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
17

18 United States ex rel. Nyoka Lee, et
19 al.,

20 Plaintiff,

21 vs.

22 Corinthian Colleges Inc., et al.,

23 Defendants.

Case No. 07-cv-01984 PSG (MANx)

**CORRECTED DECLARATION OF
ACHYUT J. PHADKE IN SUPPORT
OF DEFENDANTS CORINTHIAN
COLLEGES INC., DAVID MOORE,
AND JACK D. MASSIMINO'S
MOTION TO DISMISS**

[Filed in Support of Notice of Motion and
Motion to Dismiss with attached
Memorandum of Points and Authorities]

Judge: Honorable Philip S. Gutierrez
Courtroom: 880
Date: March 11, 2013
Time: 1:30 p.m.

EXHIBITS G-K FILED UNDER SEAL

1 I, Achyut J. Phadke, hereby declare:

2 1. I am an attorney in the law firm of Munger, Tolles & Olson,
3 LLP, counsel of record for Defendants Corinthian Colleges Inc. (the “School”) and
4 David Moore and Jack D. Massimino (the “Individual Defendants”). I am an
5 attorney duly admitted to practice in the State of California and before this Court in
6 the above-captioned matter. I have personal knowledge of the matters set forth
7 herein and if called upon to do so, I could and would testify competently thereto
8 under oath.

9 2. I make this declaration in support of the School and Individual
10 Defendants’ Rule 12(b)(1) Motion to Dismiss.

11 3. Attached hereto as Exhibit A is a true and correct copy of
12 excerpts of the transcript of the December 17, 2012 deposition of Relator Nyoka Lee
13 (“Lee Deposition”).

14 4. Attached hereto as Exhibit B is a true and correct copy of
15 excerpts of the transcript of the December 18, 2012 deposition of Relator Talala
16 Mshuja (“Mshuja Deposition”).

17 5. Attached hereto as Exhibit C is a true and correct copy of a
18 document entitled “Privilege Log,” electronically mailed by Relators to the School
19 and Individual Defendants on December 10, 2012.

20 6. Attached hereto as Exhibit D is a true and correct copy of a
21 document entitled “Plaintiff’s Initial Disclosures,” electronically mailed by Relators
22 to the School and Individual Defendants on September 10, 2012.

23 7. Attached hereto as Exhibit E is a true and correct copy of
24 “Relator Nyoka Lee’s Objections and Responses to Defendants Corinthian Colleges,
25 Inc., David Moore, and Jack D. Massimino’s Interrogatories to Relator Nyoka Lee –
26 Set One, Dated November 9, 2012 (7 Items),” electronically mailed by Relators to
27 the School and Individual Defendants on December 10, 2012.

28 8. Attached hereto as Exhibit F is a true and correct copy of

1 “Relator Talala Mshuja’s Objections and Responses to Defendants Corinthian
2 Colleges, Inc., David Moore and Jack D. Massimino’s Interrogatories to Relator
3 Talala Mshuja – Set One, Dated November 9, 2012 (7 Items),” electronically mailed
4 by Relators to the School and Individual Defendants on December 10, 2012.

5 9. Attached hereto as Exhibit G is a true and correct copy of
6 Exhibit 5 to the Lee Deposition.

7 10. Attached hereto as Exhibit H is a true and correct copy of
8 Exhibit 6 to the Lee Deposition.

9 11. Attached hereto as Exhibit I is a true and correct copy of
10 Exhibit 7 to the Lee Deposition.

11 12. Attached hereto as Exhibit J is a true and correct copy of
12 Exhibit 8 to the Lee Deposition.

13 13. Attached hereto as Exhibit K is a true and correct copy of
14 Exhibit 13 to the Lee Deposition.

15 I declare under penalty of perjury under the laws of the United States
16 and the State of California that the foregoing is true and correct.

17 Executed on February 12, 2013, at San Francisco, California.

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19 /s/ Achyut J. Phadke
20 Achyut J. Phadke
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